

**COOLEY LLP**

BENEDICT Y. HUR (SBN: 224018)  
bhur@cooley.com  
SIMONA AGNOLUCCI (SBN: 246943)  
sagnolucci@cooley.com  
EDUARDO E. SANTACANA (SBN: 281668)  
esantacana@cooley.com  
ARGEMIRA FLÓREZ (SBN: 331153)  
aflórez@cooley.com  
HARRIS MATEEN (SBN 335593)  
hmateen@cooley.com  
ISABELLA MCKINLEY CORBO (SBN 346226)  
icorbo@cooley.com  
3 Embarcadero Center, 20<sup>th</sup> Floor  
San Francisco, CA 94111-4004  
Telephone: (415) 693-2000  
Facsimile: (415) 693-2222

*Attorneys for Defendant*  
**GOOGLE LLC**

**BOIES SCHILLER FLEXNER LLP**

Mark C. Mao (CA Bar No. 236165)  
mmao@bsflfp.com  
Beko Reblitz-Richardson (CA Bar No. 238027)  
brichardson@bsflfp.com  
44 Montgomery Street, 41<sup>st</sup> Floor  
San Francisco, CA 94104  
Tel: (415) 293-6858  
Fax: (415) 999-9695

**SUSMAN GODFREY L.L.P.**

Bill Carmody (admitted *pro hac vice*)  
bcarmody@susmangodfrey.com  
Shawn J. Rabin (admitted *pro hac vice*)  
srabin@susmangodfrey.com  
One Manhattan West, 50th Floor  
New York, NY 10001  
Telephone: (212) 336-8330

**MORGAN & MORGAN**

John A. Yanchunis (admitted *pro hac vice*)  
jyanchunis@forthepeople.com  
Ryan J. McGee (admitted *pro hac vice*)  
rmcgee@forthepeople.com  
201 N. Franklin Street, 7th Floor  
Tampa, FL 33602  
Telephone: (813) 223-5505

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL CATALDO,  
JULIAN SANTIAGO, and SUSAN LYNN  
HARVEY, *al.* individually and on behalf of all  
others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688 RS

**TRIAL PROCESS STIPULATIONS**

Pretrial Conf.: July 23, 2025  
Time: 10:00am PT  
Ctrm: 3 - 17th Floor  
Judge: Hon. Richard Seeborg  
  
Action filed: July 14, 2020  
Trial Date: August 18, 2025

1 Plaintiffs Anibal Rodriguez, Julian Santiago, and Susan Lynn Harvey (“Plaintiffs”) and  
2 Defendant Google LLC (“Defendant”) hereby stipulate that:

- 3 1. All bates-stamped documents produced by the Parties and listed on the joint exhibit list shall  
4 be deemed to be true and correct copies of documents maintained in the producing party’s  
5 files as of the date that party collected the document(s) under Federal Rule of Evidence 901,  
6 unless an opposing party raises a good faith objection to authenticity as to any document or  
7 based on evidence adduced at trial. All other objections to trial exhibits are preserved.
- 8 2. Except for expert witnesses, Named Plaintiffs, and a designated representative for Google  
9 (currently anticipated by Google to be Steve Ganem), witnesses will be excluded from the  
10 courtroom during trial until they are excused.
- 11 3. A neutral introduction may be made before the testimony of each witness who testifies by  
12 deposition designation that identifies the witness’s name, title, and current employment  
13 status.
- 14 4. For deposition designations, the Party calling the witness by deposition shall, no later than  
15 5:00 p.m. PT three calendar days before the witness is to be called at trial, serve a chart of the  
16 deposition testimony it expects to play and the exhibits it expects to introduce with the  
17 designations, with a listing of all previously served objections and counter-designations. The  
18 Parties may use copies of certified deposition transcripts rather than the originals. The Parties  
19 will meet and confer promptly to narrow their disputes and identify any remaining objections  
20 to be presented to the Court in a joint report to be filed by 8:00 p.m. PT two calendar days  
21 before the testimony is expected to be played at trial, which includes a copy of the entire  
22 deposition testimony of the witness at issue, clearly highlighting the designations, counter-  
23 designations, exhibits and any remaining objections, as well as a brief indication of the basis  
24 for the objection and the offering Party’s response to it.
- 25 5. Each Party must identify any witnesses they intend to call (live or by deposition) in the good-  
26 faith anticipated order in which they will be presented, no later than 5:00 p.m. PT three  
27 calendar days before the day on which the witnesses will testify.  
28

6. Each Party must identify any exhibits or demonstratives they anticipate in good faith they will use or offer into evidence during their examination of a witness they control or employ(ed) by 5:00 p.m. three calendar days before they anticipate that witness will be called (live or by deposition), except that Google may have until 8:00 a.m. the day after Plaintiffs disclose they intend to call a Google witness adversely. The Parties shall promptly confer regarding any unresolved objections to such exhibits and/or previously-disclosed demonstratives to narrow their disputes and identify any remaining objections to be presented to the Court in a joint report to be filed by 8:00 p.m. one calendar day before the calling party plans to call that witness.

7. For clarity, the disclosure obligation in paragraph 6 above shall not apply to exhibits and demonstratives intended to be used (1) with witnesses called adversely (e.g., a current or former Google employee being called by Plaintiffs during their case-in-chief), (2) on cross-examination of a witness the party does not control, (3) solely for impeachment, or (4) re-direct of a witness the party controls and calls during their case so long as the re-direct is limited to the scope of cross-examination. In addition, when Plaintiffs call Google witnesses adversely in Plaintiffs' case, Google will disclose the materials required by Paragraph 6 above for their initial direct examination, but will not be obligated to do so for their re-direct, if any, so long as Google's re-direct is limited to the scope of Plaintiffs' re-cross, if any.

IT IS SO STIPULATED.

Dated: August 15, 2025

Respectfully submitted,

COOLEY LLP

By: /s/ Eduardo Santacana

Benedict Y. Hur

Simona Agnolucci

Eduardo E. Santacana

Argemira Flórez

Harris Mateen  
Isabella Mckinley Corbo  
*Attorneys for Defendant*  
*GOOGLE LLC*

Dated: August 15, 2025

BOIES SCHILLER FLEXNER LLP

By: /s/ Mark C. Mao

Mark C. Mao  
Beko Reblitz-Richardson  
*Attorneys for Plaintiffs*

**FILER'S ATTESTATION**

I, Mark C. Mao, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: August 15, 2025

By: /s/ Mark C. Mao